



PUBLIC WORKS

Department of Ecology
Water Quality Program
SEP 28 2004

September 23, 2004

Bill Moore
Industrial Stormwater General Permit
Washington St Dept. of Ecology
P. O. Box 47600
Olympia, Washington 98504-7600

Subj.: Industrial Stormwater General Permit

Dear Mr. Moore:

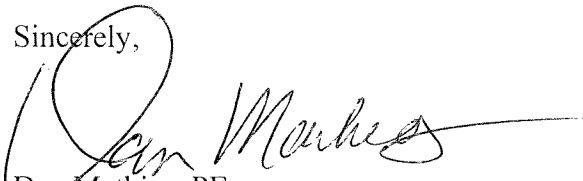
Thank you for the opportunity to comment on the revised Industrial Stormwater General Permit. The City of Everett has only two comments, both of which address potential duplication with other environmental regulations.

① First, as you know, one of the six minimum measures for the phase II municipal stormwater general permit is pollution prevention/good housekeeping for municipal operations. The Dept of Ecology will be required to include this minimum measure in its phase II municipal stormwater general permit, which is currently scheduled for final issuance in late summer 2005. Some municipal operations such as vehicle maintenance will be considered industrial discharges and subject to the industrial stormwater general permit. To avoid unnecessary duplication (and possible inconsistencies and incompatibilities), the City of Everett recommends that any municipal stormwater discharges covered by the municipal stormwater general permit be exempt from the Industrial Stormwater General Permit.

② Second, the section S3C identifies potable water discharges as a conditionally approved non-stormwater discharge and requires a stormwater pollution prevention plan (SWPPP). Pursuant to the 1998 listing of Chinook salmon as a threatened species in the Puget Sound ESU, several municipalities developed a Regional Road Maintenance ESA Program that was ultimately approved by NOAA-Fisheries and incorporated into a 4d rule. The Regional Road Maintenance ESA Program includes best management practices (BMPs) for non-stormwater discharges from potable water systems. The Industrial Stormwater General Permit should waive the requirement for a SWPPP for potable water discharges when the requirements of the Regional Road Maintenance Plan are implemented.

Again, thank you for the opportunity to comment. If you have any questions regarding these comments, feel free to call me at (425) 257-8855 or e-mail me at dmathias@ci.everett.wa.us.

Sincerely,



Dan Mathias, PE
Utilities Engineer